

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through)	
Incentive Auctions)	
)	
Broadcast Incentive Auction)	AU Docket No. 14-252
Comment Public Notice)	
Auctions 1000, 1001 and 1002)	

REPLY COMMENTS OF CONNECTICUT PUBLIC BROADCASTING, INC.

Connecticut Public Broadcasting, Inc. ("CPBI"), by counsel, files these reply comments in response to the "Comment Public Notice" in the above-captioned proceeding, FCC 14-191 (rel. Dec. 17, 2014) ("Comment PN"). CPBI is the licensee of four public television stations, WEDH(TV), Hartford; WEDW(TV), Bridgeport; WEDN(TV), Norwich; and WEDY(TV), New Haven, all Connecticut.

CPBI commends the Commission staff on the tremendous effort so far to implement the auction authorized by Congress in the Spectrum Act. CPBI previously commented on the standard of eligibility for participation in the reverse auction to relinquish spectrum rights (CPBI Comments of January 25, 2013), and is gratified that the Commission acknowledged in its *Incentive Auction R&O* the eligibility of Stations such as WEDY which held construction permits for channel changes. CPBI has subsequently completed the modification of Station WEDY so that it is entitled to participate in the auction or, alternatively, to receive full protection for its facilities as part of the post-auction repack of television stations.

CPBI wants the broadcast television spectrum auction to succeed, and as such wants to support commenters who have proposed changes to the opening price methodology outlined in paragraphs 95-101 of the Comments Public Notice. Specifically, CPBI supports the "compromise proposal" of the Expanding Opportunities for Broadcasters Coalition (EOBC), under which the structure of the station volume formula would be preserved, but the exponent for the population component would be modified from 0.5 to 0.25 (EOBC Comments at 23-26). CPBI believes the nearly universally higher opening bid prices resulting from the application of the compromise proposal would encourage the largest number of licensees, and especially licensees of smaller stations, to participate in the auction.

Respectfully submitted,

CONNECTICUT PUBLIC BROADCASTING, INC.



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